



January 23, 2012

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Ex Parte to WC Docket 11-42

Ms. Dortch:

Century Corporation (Century), one of the leading providers of Enrollment Processing Systems and Services for wireless and wire-line ETCs, is pleased to inform the Commission of the progress made in eliminating Fraud, Waste and Abuse (FWA) in the Lifeline program. Century's FormsFullCircle™ Multi-Channel Enrollment Platform is in use by several program participating ETCs and has processed in excess of 231,000 Lifeline Enrollments in December of 2011. On behalf of our client ETCs, Century has developed and is in the process of implementing several standards and processes of relevance to the Commission. These include:

- A.) Standardizing and implementing the capture of "Date of Birth" and "Last 4 Digits of Social Security Number" for all ETCs using FormsFullCircle™.
- B.) Engaging the services of a third party vendor to validate addresses given by program enrollees in real-time.
- C.) Engaging the services of LexisNexis to validate the identity of program enrollees in real-time.
- D.) Engaging in discussions with several State Public Utilities Commissions on the potential interim capabilities of validating the eligibility program of enrollees in real-time.
- E.) Engaging the services of multiple B/OSS Systems, including BeQuick Software, Inc. (QuickTel), Overgroup Consulting, LLC (H2O) and others, to check individual ETC subscriber databases in order to validate current ETC program participation level in real-time, based on address matching rules.
- F.) Developing the architecture and processes to cross-check the subscriber databases of all ETCs using FormsFullCircle™ in order to validate current program participation levels in real-time, based on individuality and not address.
- G.) Developing the architecture, processes and services to comprehensively Re-Certify every Lifeline program participant for ETCs using FormsFullCircle™.
- H.) Developing the architecture, processes and services to capture and retain a copy of each enrollee's qualifying eligibility document in "Full Compliance" States.

Additionally, Century has identified five access points for FWA in the Lifeline Enrollment Process. These include, but may not be limited to:

- 1.) The ETC – where ETCs, either knowingly or unknowingly, enroll the qualifying participant multiple times. Century has resolved this first FWA access point through items B and E.

- 2.) The Agent – where Agents, either knowingly or unknowingly, enroll erroneous participant information. Century has resolved this second FWA access point through item C.
- 3.) The Enrollee – where Enrollees, either knowingly or unknowingly, enroll for Lifeline service even though they do not qualify for the program. Century is in progress of partially resolving this issue through items D and H; however, this third FWA access point will only be fully resolved by the implementation of a National Eligibility Database as proposed by the Commission.
- 4.) The Inter-ETC – where multiple ETCs, either knowingly or unknowingly, enroll the same qualifying participant multiple times. Century has partially resolved this fourth FWA access point through item F, however, this functionality is optional and at the ETCs discretion. Century applauds Nexus' and Tracfone's voluntary enforcement of a similar service and encourages USAC and the Commission to quickly and strictly detect and enforce present Inter-ETC duplicate enrollments. As the likelihood of reimbursement cut-off for duplicate participants realizes, the natural financial rules of the marketplace will then compel ETCs to enact this type of functionality in both our FormsFullCircle™ system and in the proposed Tracfone and Nexus collaborative system without Commission intervention.
- 5.) The True Criminal – where an individual knowingly forges or steals an eligibility or identification document. While this type of fraud will be partially detected by items C and D, the National Eligibility Database will be the only truly complete solution: taking away the nearly impossible task of determining the validity of the hundreds of varying eligibility documents from the susceptible ETC agent.

Century agrees with Tracfone's and Nexus' view that an annual cap depriving qualifying consumers is unprecedented and unwarranted, especially given the described advancements to Enrollment Processing across the industry. Century also agrees with previously stated views that every Lifeline participant should be required to re-certify annually, in order to stave off FWA, until the National Database becomes available. Finally, Century supports the view that the Link-Up subsidy remain in effect, at either a full or reduced reimbursement rate, given the listed processes and costs associated with service activation and enrollment compliance. Century is confident that the listed contributions to Lifeline Enrollment Processing by our FormsFullCircle™ system and the proposed Commission recommendations contained herein will bring immediate reductions to Lifeline expenditures and provide long-term sustainability to the program.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced docket.

Respectfully Submitted,

/s/ Matthew S. O'Brien

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